

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-80144-CR-SMITH/MAYNARD(s)(s)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOFF STENN WROY PHILOSSAINT,

Defendant.

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MOTION TO WITHDRAW AS COUNSEL

The undersigned attorney hereby moves to withdraw as counsel of record for defendant Joff Stenn Wroy Philossaint. In support of this request, counsel would state the following:

1. Undersigned counsel was privately retained to represent the defendant in the above captioned cause, wherein he was charged with conspiracy to commit wire fraud, two counts of conspiracy to commit money laundering, and obtaining naturalization by fraud.
2. Counsel represented the defendant through a change of plea to three of the four counts against him and went to trial on the fourth count of obtaining naturalization by fraud.
3. Defendant was convicted by a jury as to count four, and sentencing is pending.
4. Since the jury's verdict, there have arisen irreconcilable differences between the undersigned counsel and the defendant, which have resulted in counsel's inability to provide continued effective counsel to Mr. Philossaint.
5. Counsel therefore must move to withdraw from further representation in this matter.

6. Counsel has discussed this matter with Mr. Philossaint, who advised that he is unable to retain private counsel. As such, it is requested that the Court appoint counsel to represent him in this matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing has been electronically filed and served on counsel for all parties via CM/ECF this 22nd day of February 2023. Counsel has also provided a copy of this motion to the defendant via U.S. Mail on this same date.

Respectfully submitted,

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